

1 LAWRENCE P. RAMIREZ (State Bar No. 141550)
2 LINDA KENY (State Bar No. 187013)
3 NATALIE NABIZADA (State Bar No. 319798)
4 THE LITIGATION LAW GROUP
5 111 NORTH MARKET STREET, SUITE 1010
6 SAN JOSE, CA 95113
7 PHONE (408) 971-1119 FAX (408) 971-1129
lpramirez@thellg.com
natalien@thellg.com

8
9 Attorneys for Defendant
10 JOSE SANCHEZ FLORES

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA

Plaintiff,
v.
JOSE SANCHEZ FLORES
Defendant.

CASE NO: 5:17-CR-00506-BLF (N.D. CA.)

STIPULATION AND ~~PROPOSED~~ ORDER
FOR A CHANGED CONDITION OF
RELEASE ALLOWING NON-OVERNIGHT
TRAVEL TO EASTERN DISTRICT OF
CALIFORNIA

The Honorable Beth Labson Freeman

The Defendant, Jose Sanchez Flores, and the United States of America, by and through
undersigned counsel, hereby agree and stipulate to the following:

1 **WHEREAS**, defense counsel has represented that Defendant's work requires him to be
2 on-site and travel regularly to the Eastern District to meet vendors, customers, and suppliers,
3 which he is unable to do so due to the current travel restriction. Therefore, Defendant needs
4 access to the Eastern District of California to conduct the necessary activities for basic operation
5 and management of his business.

6 **WHEREAS**, defense counsel has communicated with Defendant's pretrial services
7 officer, Diego Romero, and Mr. Romero has no objection to the necessary change of conditions.

8 **IT IS HEREBY STIPULATED** by Defendant, Jose Sanchez Flores, and the United
9 States of America, by and through undersigned counsel that the Order Setting Conditions of
10 Release and Appearance Bond will be modified to allow non-overnight travel to the Eastern
11 District of California.

12
13
14
15 DATED: AUGUST 3, 2018

16
17
18 *s/ Natalie Nabizada*

19 Lawrence Ramirez, Esq.
20 Natalie Nabizada, Esq.
21 Linda Keny, Esq.
22 Attorneys For ~~Plaintiff~~ Defendant

23
24
25 *s/ Michael G. Pitman*

Michael G. Pitman (DCBN 484164)
Assistant United States Attorney

1 **[PROPOSED] ORDER**
2

3 The Court having reviewed the foregoing Stipulation, and good cause appearing
4 therefore:

5 **IT IS HEREBY ORDERED** that the Order Setting Conditions of Release and
6 Appearance Bond (Dkt#8) restricting Defendant's travel will be modified so as to allow non-
7 overnight travel to the Eastern District of California.

8
9 IT IS SO ORDERED.

10
11 Dated: August 8, 2018

